

169903



15640 Clayton Avenue East

Rosemount, MN 55068-2056

April 26, 2002

Docket Clerk

Docket No. BTS-2001-10909 -23

US Department of Transportation

400 Seventh St. SW

Room PL-401

Washington, DC 20590-0001

DEPT. OF TRANSPORTATION
DOCKETS
02 MAY 23 PM 2:25

RE: NOTICE OF REQUEST TO RENEW THE APPROVAL OF INFORMATION
COLLECTIONS: OMB NO.2139-0002 AND 2139-0004 (FINANCIAL AND OPERATING
STATISTICS FOR MOTOR CARRIER PROPERTY)

Dear Sir or Madam:

Olson Carriers, Inc. is a motor carrier of property subject to the Bureau of Transportation Statistics ("BTS") financial reporting requirements. We oppose the Office of Management & Budget's ("OMB") renewing their approval of BTS' reporting forms for annual and quarterly financial reporting by motor carriers. We also take issue with the data submitted by BTS in support of its request for approval of the information collection.

The report serves no useful purpose. BTS describes its use of this information as follows: "The data and information collected is made publicly available and used by the BTS to determine a motor carrier's compliance with the F&OS program requirements prescribed in the BTS regulations (49 CFR 1420)." See 66 F.R. at 55982 (Nov. 5, 2001). In effect the only government use of the information is to ensure that the carriers comply with the requirement to submit the information. This information apparently is not used by any agency or branch of the Department of Transportation (including BTS by its own admission), or to our knowledge, by any other agency or department of the federal government.

The reporting requirement is a remnant of a bygone era in which the rates and operations of interstate motor carriers were strictly regulated by the former Interstate Commerce Commission. Since enactment of the Interstate Commerce Commission Termination Act, the federal government no longer regulates the rates or practices of motor carriers of property. Thus, the collection of this information no longer serves any valid government purpose.

Finally, most of the 3,000 carriers upon whom this pointless requirement is imposed are privately held companies. These overly detailed reports are an invasion of the carrier's privacy and do no more than provide our competitors and others with information that they would otherwise not be entitled to receive or would have to request from us.

Responses to BTS' inquiries:

1. Accuracy of the estimated burden. BTS states that the preparation of the Form M, the annual report, requires only 9 hours. The time asserted by BTS does not take into consideration the many hours spent maintaining this information in the form needed to comply with the BTS reporting requirements. In our own experience, the preparation of this report requires at least 50 hours. The information that BTS requires us to maintain is in a format quite different from how we would customarily maintain it for our own management and operational uses. The cost and time of the effort should also be calculated into the considerable cost imposed by the BTS.

2. & 3. Ways to enhance the quality, usefulness, and clarity of the collected information; and ways to minimize the collection burden without reducing the quality of the information collected including additional use of the automated collection techniques or other forms of information technology. It is our belief that the requirements of 49 CFR 1420 should be eliminated. If BTS, however, finds it necessary to continue the reporting requirement it can (and should) obtain information as to the financial health of individual motor carriers in a much-abbreviated format. We would suggest that the current Form M be replaced with a post card that requests:

Carrier's name,
address,
USDOT census number,
gross and net revenues, and
gross expenses on an annual basis.

The information a carrier would provide on this card would be clear and simple. While the abbreviated filing would reduce the quantity of the information collected, it would improve the quality of the information collected. Perhaps in this simplified format, agencies at USDOT and elsewhere in the federal government would find a use for the data. The post card style filing would be simple for a carrier to complete. Since only totals would be provided, the abbreviated filing would eliminate the need for carriers to maintain one set of accounts for their own purposes and one for filing with BTS.

I urge OMB not to approve the continuation of the current Form M, and to require BTS to consider adopting a 'no reporting requirement'. Otherwise, if that is not possible, please consider an abbreviated and simplified reporting procedure. Thank you for your time and consideration.

Sincerely,



Susan Olson
Vice President/Treasurer